



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • www.citizen.org

March 22, 2018

M. Patricia Smith
200 Constitution Avenue, NW
Room S-2002
Washington DC 20210

Dear Ms. Smith:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Byron Anderson, Special Assistant to the Secretary of Labor, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.

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Paragraph 7 is a critical provision of Trump's ethics executive order designed to prevent former lobbyists from unduly influencing official actions of the administration solely in the interests of their paying clients. It is important that the White House Counsel and agency ethics officers take the necessary steps to ensure compliance to this conflict of interest rule.

The fact that so many appointees appear not to be in compliance raises serious questions about the commitment of the administration to its own ethics rules.

Public Citizen respectfully requests a response to this query at your earliest convenience.

Sincerely,

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Stefan Passantino
Office of the White House Counsel
1600 Pennsylvania Avenue, NW,
Washington DC 20500

Dear Mr. Passantino:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that George David Banks, Special Assistant to the President for International Energy and Environment, National Economic Council, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Kendra Link
1000 Wilson Blvd.
Suite 1600
Arlington, VA 22209

Dear Ms. Link:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Peter Barrett, Senior Advisor for the U.S. Trade and Development Agency, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Judy A. Kaleta
Office of the General Counsel
1200 New Jersey Avenue, SE
Washington DC 20590

Dear Ms. Kaleta:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Erika Baum, Executive Assistant to the Secretary of Transportation, appears to be working on the same specific issue areas she had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Melinda Loftin
1849 C Street, NW
Mail Stop 7352
Washington DC 20240

Dear Ms. Loftin:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that David Bernhardt, Deputy Secretary of the Interior, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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200 Constitution Avenue, NW
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Government affairs lobbyist
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March 22, 2018

Joseph B. Maher
3801 Nebraska Avenue, NW
Building 1, Room 01-021A
Washington DC 20528

Dear Mr. Maher:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Kevin Carroll, Special Adviser in the Department of Homeland Security, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Elizabeth J. Fischmann
200 Independence Avenue, SW
700-E Humphrey Bldg.
Washington DC 20201

Dear Ms. Fischmann:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Timothy Clark, Senior Adviser to the Secretary of Health and Human Services, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

David Maggi
14th Street & Constitution Avenue
Room 5876,
Washington DC 20230
dmaggi@doc.gov

Dear Mr. Maggi:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Earl Comstock, Director, Office of Policy and Strategic Planning in the Department of Commerce, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Craig Holman, Ph.D.
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March 22, 2018

Lee J. Lofthus
Assistant Attorney General
950 Pennsylvania Avenue, NW
Room 1111
Washington DC 20530

Dear Mr. Loftus:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Makan Delrahim, Assistant Attorney General, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Beth A. Zorc
451 Seveth Street, NW
Room 10214
Washington DC 20410

Dear Ms. Zorc:

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Government affairs lobbyist
Public Citizen's Congress Watch division



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • www.citizen.org

March 22, 2018

Melinda Loftin
1849 C Street, NW
Mail Stop 7352
Washington DC 20240

Dear Ms. Loftin:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Daniel Fisher, Clerk and Assistant in the Department of Interior, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.


Using a partial list of 572 political appointees into the administration, Public Citizen has documented dozens of former lobbyists who appear to be overseeing the same specific issue areas they had lobbied in the previous two years, but only six have been recognized as such by the administration and received ethics waivers. At least 30 other appointees appear to be in violation of the executive order with no publicly disclosed waivers from the conflict of interest rule. The study is available at: <http://bit.ly/2wpZ0JV>

Paragraph 7 is a critical provision of Trump's ethics executive order designed to prevent former lobbyists from unduly influencing official actions of the administration solely in the interests of their paying clients. It is important that the White House Counsel and agency ethics officers take the necessary steps to ensure compliance to this conflict of interest rule.

The fact that so many appointees appear not to be in compliance raises serious questions about the commitment of the administration to its own ethics rules.

Public Citizen respectfully requests a response to this query at your earliest convenience.

Sincerely,

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Susan F. Beard
1000 Independence Avenue, SW
Room 6A-211
Washington DC 20585

Dear Ms. Beard:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that William Greene, Assistant to the Secretary of Energy, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

James Carroll
725 17th Street, NW
New Executive Office Bldg.
Room 5001
Washington DC 20503

Dear Mr. Carroll:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Joseph Grogan in the Office of Management and Budget, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • www.citizen.org

March 22, 2018

Marcella Goodridge
400 Maryland Avenue, SW
Suite 6E231
Washington DC 20202

Dear Ms. Goodridge:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Taylor Hansen, Special Assistant to the Secretary of Education, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

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Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Judy A. Kaleta
Office of the General Counsel
1200 New Jersey Avenue, SE
Washington DC 20590

Dear Ms. Kaleta:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Christopher Hess, Special Adviser in the Department of Transportation, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

David Maggi
14th Street & Constitution Avenue
Room 5876
Washington DC 20230
dmaggi@doc.gov

Dear Mr. Maggi:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Gilbert Kaplan, Undersecretary for International Trade, Department of Commerce, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Joseph B. Maher
3801 Nebraska Avenue, NW
Building 1, Room 01-021A
Washington DC 20528

Dear Mr. Maher:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Julie Kirchner, Adviser in the Department of Homeland Security, appears to be working on the same specific issue areas she had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

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Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Stuart Bender
1400 Independence Avenue, SW
Whitten Bldg., Room 347-W
Washington DC 20250
DAEO.ethics@oe.usda.gov

Dear Mr. Bender:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Russell Laird, Special Assistant in the Department of Agriculture, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Elizabeth J. Fischmann
200 Independence Avenue, SW
700-E Humphrey Bldg.
Washington DC 20201

Dear Ms. Fischmann:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Courtney Lawrence, in the Department of Health and Human Services, appears to be working on the same specific issue areas she had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Susan F. Beard
1000 Independence Avenue, SW
Room 6A-211
Washington DC 20585

Dear Ms. Beard:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Mark Maddox, Assistant to the Secretary of Energy, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Ruth M.S. Vetter
1600 Defense Pentagon
Room 3B652
Washington DC 20301

Dear Ms. Vetter:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Justin Mikolay, Special Assistant in the Office of Secretary of Defense, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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March 22, 2018

Judy A. Kaleta
Office of the General Counsel
1200 New Jersey Avenue, SE
Washington DC 20590

Dear Ms. Kaleta:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Allison Moore, Press Secretary in the Department of Transportation, appears to be working on the same specific issue areas she had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • www.citizen.org

March 22, 2018

Elizabeth Horton
1500 Pennsylvania Avenue, NW
Room 2023 MT
Washington DC 20220

Dear Ms. Horton:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Andrew Smith, Adviser in the Department of Treasury, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

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Government affairs lobbyist
Public Citizen's Congress Watch division



215 Pennsylvania Avenue, SE • Washington, D.C. 20003 • 202/546-4996 • www.citizen.org

March 22, 2018

Elizabeth J. Fischmann
200 Independence Avenue, SW
700-E Humphrey Bldg.
Washington DC 20201

Dear Ms. Fischmann:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Steven Valentine, Special Assistant in the Department of Health and Human Services, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.

Using a partial list of 572 political appointees into the administration, Public Citizen has documented dozens of former lobbyists who appear to be overseeing the same specific issue areas they had lobbied in the previous two years, but only six have been recognized as such by the administration and received ethics waivers. At least 30 other appointees appear to be in violation of the executive order with no publicly disclosed waivers from the conflict of interest rule. The study is available at: <http://bit.ly/2wpZ0JV>

Paragraph 7 is a critical provision of Trump's ethics executive order designed to prevent former lobbyists from unduly influencing official actions of the administration solely in the interests of their paying clients. It is important that the White House Counsel and agency ethics officers take the necessary steps to ensure compliance to this conflict of interest rule.

The fact that so many appointees appear not to be in compliance raises serious questions about the commitment of the administration to its own ethics rules.

Public Citizen respectfully requests a response to this query at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Holman". The signature is fluid and cursive, with the first name "Craig" and last name "Holman" clearly distinguishable.

Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Janice Kaye
600 17th Street, NW
Room 223
Washington DC 20506

Dear Ms. Kaye:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Stephen Vaughn, General Counsel, Office of U.S. Trade Representative, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Kevin Minoli
Ariel Rios Bldg.
1200 Pennsylvania Avenue, NW
Mail Code 2377A,
Washington DC 20460

Dear Mr. Minoli:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Andrew Wheeler, Deputy Administrator, Environmental Protection Agency, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

If I was a registered lobbyist within the 2 years before the date of my appointment, in addition to abiding by the limitations of paragraph 6, I will not for a period of 2 years after the date of my appointment participate in any particular matter on which I lobbied within the 2 years before the date of my appointment or participate in the specific issue area in which that particular matter falls.

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Public Citizen respectfully requests a response to this query at your earliest convenience.

Sincerely,

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Craig Holman, Ph.D.
Government affairs lobbyist
Public Citizen's Congress Watch division



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March 22, 2018

Joseph B. Maher
3801 Nebraska Avenue, NW
Building 1, Room 01-021A
Washington DC 20528

Dear Mr. Maher:

Public Citizen is writing to express its concern about the implementation and enforcement of paragraph 7 of President Donald Trump's ethics Executive Order No. 13770. Paragraph 7 of the executive order expressly prohibits former lobbyists from working in the administration on the same "specific issue area" they had lobbied within the previous two years, unless a waiver has been issued. A recent study by Public Citizen has identified that Chad Wolf, Adviser in the Department of Homeland Security, appears to be working on the same specific issue areas he had lobbied on within the last two years, and has not received a waiver from the ethics rules.

Public Citizen requests an explanation from your office for this anomaly.

Paragraph 7 of Executive Order No. 13770 requires political appointees into the Trump administration to pledge:

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Craig Holman, Ph.D.
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